



GARY R. HERBERT
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State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

August 22, 2012

Scott Parsons
Staker Parsons Companies
89 West 13490 South, Suite 100
Draper, Utah 84020

Subject: Fifth Review and Name Change of Notice of Intention to Commence Large Mining Operations, Staker Parsons Companies, Beef Hollow Facility (Point West), M/035/0042, Salt Lake County, Utah

Dear Mr. Parsons:

The Division of Oil, Gas and Mining has completed a review of the referenced Notice of Intention to Commence Large Mining Operations (NOI) for the Beef Hollow Facility, which was received on June 19, 2012. The name change from Point West is approved. The attached comments will need to be addressed before tentative approval may be granted.

Thank you for submitting the NOI formatted to follow the R647 rules, and the comments in this review are likewise organized. Please address those items requested in the attached technical review by sending replacement pages using redline and strikeout text. When the NOI is determined technically complete, the Division will ask that you submit two clean copies of the complete and corrected NOI. Upon final approval, both copies will be stamped "approved" and one will be returned for your records.

The Division will suspend further review until your response is received. If you have any questions in this regard please contact me at 801-538-5261 or Leslie Heppler, at 801-538-5257. Thank you for your cooperation in completing this permitting action.

Sincerely,

Paul B. Baker
Minerals Program Manager

PBB: lah: eb
Attachment: Review
cc City of Herriman
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**FIFTH REVIEW OF NOTICE OF INTENTION
TO COMMENCE LARGE MINING OPERATIONS**

**Staker Parsons Company
Beef Hollow Mine (formerly Point West)
M/035/0042
August 22, 2012**

General Comments:

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
1	General	Submittal should be formatted to easily incorporate additional revisions and amendments.	lah	
2	General	The Division may have additional comments based on submittals received in the future. Please make every effort to submit a complete NOI.	lah	
3	Appendix A	Appendix A contains no correspondence. Please either submit the correspondence or delete Appendix A.	lah	
4	Appendix D	Please include a brief table that summarizes the ground water data. Include well location(s), elevation of well collar(s) and the depth of water.	lah	

R647-4-104 - Operator Information and Surface and Mineral Ownership

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
5	Page 7 Name	In addition to the contact person, the Division requests that the NOI include the names of company officers and that these match the information on file with the Division of Corporations.	lah	
6	Page 7 Location	Sections 7 and 8 are not shown on Figure 1 as being included in the mine boundary. Modify the text (or the figure).	lah	
7	Page 9	The plan says no information has been discovered indicating any record of mineral mining rights for the Beef Hollow Facility. Please clarify the agreement with the landowner and discuss what research has been done to determine the mineral ownership. Research with the County Recorder should be able to determine mineral ownership.	lah	
8	Page 9	Not all adjacent landowners are included on pages 9 and 10. Please include the adjacent landowners shown on Figure 2.	lah	

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
9	Page 9 and Figure 2	<p>There are some parcels of land adjacent to the mine that are unlabelled on Figure 2. Please show who owns this land. The plan says the US Bureau of Reclamation is an owner of adjacent property, but Figure 2 only shows USA as an owner. The land owned by "USA" appears to be part of Camp Williams with the following contact information:</p> <p>Lieutenant Colonel Chris M. Filoso, UTARNG Camp Williams Department of Public Works 17800 Camp Williams Road Riverton, UT 84065</p> <p>Phone 801-878-5404</p>	lah	

R647-4-105 - Maps, Drawings & Photographs

105.1 - Topographic base map, boundaries, pre-act disturbance

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
10	Fig 2	If the parcels of land labeled USA are part of Camp Williams, please change or clarify this label.	lah	
11	Fig 3, 5, & 6	Not all of the permit boundary is shown on the western edge of some of the figures. Either change the scale of the map or add a note, that indicates there is no old disturbance and no new disturbance is planned in the near future.	lah	
12	Fig 6	The area shown in blue as Industrial is noted as Revegetation, but it is not revegetated, and the area needs to be stabilized before the precast company leaves the area. The responsible party needs to be clearly defined in the NOI.	lah	

105.2 - Surface facilities map

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
13	Omission	Section 106.2 says the operations will include the manufacture of concrete and hot mix asphalt. Include a schematic drawing showing the hot mix asphalt and concrete plants.	lah	

105.3 - Drawings or Cross Sections (slopes, roads, pads, etc.)

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
14	Figure 8	This figure indicates that phase 2 has a bond. Phase 2 has neither a bond or bond calculations.	lah	
15	Figure 8	Those areas shown on Figure 6 as being regraded and not yet revegetated need to be shown on Fig 8.	lah	
16	Figure 9	Ephemeral drainages are noted as "streams;" please revise to indicate actual conditions	lah	
17	Fig 11,12,13	Please use horizontal and vertical labels for all slope angles, e.g. 2H:1V.	lah	

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
18	Figure 9	Please provide the hydrologic designs for incorporation into the mining and reclamation plan. Figure 9 shows two secondary desiltation basins, six sediment basins, three on-stream sediment basins, and five culverts. It also lists flows Q1-6 but does not identify where these apply and what designs and parameters are associated with these values. It does reference "The Rosecrest and South Hills Storm Master Plan" by Nolte Engineering dated December 2007, but the plan does not contain any information from this Master Plan. This figure was piecemealed from the previous plan submitted by Construction Materials Company and the applicable hydrologic design information was not included. The Division needs culvert designs and sediment structure designs to be included in the plan.	TM	

105.4 - Photographs

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
19	Page 12	Typographic error: photographs from CMC are included under Appendix B; please correct.	lah	

R647-4-106 - Operation Plan

106.2 - Type of operations conducted, mining method, processing etc.

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
20	Page 13	Commit in the NOI to follow national standards for blasting and vibration	lah	
21	Page 13-14	Include a typical hot mix asphalt plant and typical concrete plant in the bond calculations.	lah	

106.3 - Estimated acreages disturbed, reclaimed, annually

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
22	Table 1	At the last inspection, there were several stockpiles of topsoil within the permit boundary from soil that was salvage by CMC. Many of the previously disturbed small mine areas had the topsoil reapplied. Please add the estimated volume of topsoil to be salvaged.	lah	
23	Table 1	Overburden, waste dumps and sediment pond acres need to be included in Table 1.	lah	
24	Table 1	Table should include the phase 2 mining area shown on Figure 8.	lah	
25	Page 15	The term "Historic mining" is used in the 1 st paragraph. Re-label as prior disturbance and note the prior disturbance will be bonded and later reclaimed by the operator.	lah	

106.5 - Existing soil types, location, amount

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
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Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
26	Page 15	The soils data provided indicate that there is significantly more soil available for salvage than the 6" average currently in the text of the NOI. Only one of the seven soil types had 6" or less of available soil; the other six all had in excess of 12" (three soil types had over 3 feet). Please plan to salvage all available soils so that there is a minimum of 12" of soil to spread over all areas to be revegetated. At the last inspection it was noted that the topsoil depth in many of the drainages exceeds ten feet. (there are also many rocky ridges that have less than 2" of topsoil).	Lk & lah	
27	Appendix G – Page 8	The soils map provided is at best very difficult to read. Please change the soil boundary lines to a higher contrasting color and make sure the labels are legible.	Lk & lah	

106.6 - Plan for protecting & re-depositing soils

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
30	Page 17	Acreage noted in text should match acreage noted on Figure 8.	lah	
31	Page 23	Regarding the proposed seed mix for topsoil protection, please reduce the amount of crested wheatgrass to 1 pound per acre, and add alfalfa at 1 pound per acre.	lk	
32	Page 24	As written "...greater than 3 to 1 will exist. . . ." For consistency please rewrite to 3H:1V.	lah	
33	Page 28	Please change plans to show replacement of a minimum of 12 inches of topsoil for reclamation.	lk	

106.8 - Depth to groundwater, extent of overburden, geology

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
34	Page 19	Typographical error: change "frill" to "drill."	lah	

R647-4-109 - Impact Assessment

109.4 - Slope stability, erosion control, air quality, safety

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
35	Page 25	Add blasting verbiage under public safety. Commit in the NOI to follow national standards for blasting and vibration.	lah	

109.5 - Actions to mitigate any impacts

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
36	Page 25 - Omission	No mitigation is noted. If none is needed please so state.	lah	

R647-4-110 - Reclamation Plan

110.1 - Current & post mining land use

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
37	Page 25	The plan says the postmining land use is "speculated" to include development to residential property, parks, and commercial property. The plan needs to show the land being reclaimed to the uses that existed prior to any mining (grazing and wildlife habitat), but it may also include a second plan for an alternate use, i.e. residential and commercial. Please show to what use the land will be reclaimed.	lah and pbb	
38	Page 26	Page 24 notes that "no slope greater than 3 to 1 will exist..." but on page 26 the plan says in two places that slopes will be no greater than 2 to 1. Please make appropriate corrections so the plan is consistent. Also please use consistent slope notation and show horizontal and vertical, e.g. 2H:1V.	lah	

110.3 - Description of facilities to be left (post mining use)

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
39	Page 27	As noted in a comment above the Cement plant and Asphalt plant need to be included in the bond and in Table 7	lah	

110.5 - Revegetation planting program

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
40	Page 28-29	Testing of topsoil should be completed prior to NOI submission. Without this information the Division needs to assume the soils need amendments and bond accordingly.	lah	
41	Page 28	It is unlikely that the proposed seed mix will provide a permanent, diverse vegetation community capable of supporting the post mining land use (please see attached seed mix for suggested changes). If this mix is not acceptable, then provide a mix that includes several grass, forb and shrub species that will meet the post mining land use. Also, provide the appropriate rate for each species in terms of pounds of pure live seed per acre, rather than a percent of the mix.	lk	
42	Page 28-29	The preferred seeding time for this area is late October to mid November. Please schedule the timing of other reclamation activities so they are completed just prior to the preferred seeding window.	lk	

R647-4-112 - Variance

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
43		No variance requested; no further comment needed.	lah	

R647-4-113 - Surety

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
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Fifth Review
Page 7 of 8
M/035/0042
August 22, 2012

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
44	Page 29	When the surety amount is calculated the statement on page 29 will need to be updated.	lah	
45		Please submit the reclamation cost estimate in the Division format. The forms are on the Division's homepage.	whw	
46		Please clarify the number of permitted/bonded acres. The permitted/bonded acres are those lands on which mining operations are allowed.	whw	

Recommended Revegetation Species List
for
Staker and Parsons Companies
Beef Hollow Mine
M/035/0042

<u>Common Name</u>	<u>Species Name</u>	<u>*Rate lbs/ac (PLS)</u>
Intermediate Wheatgrass	<u>Agropyron intermedium</u>	2.0
Bluebunch wheatgrass	<u>Agropyron spicatum</u>	2.0
Western wheatgrass	<u>Agropyron smithii</u>	2.0
Basin wildrye	<u>Elymus cinereus 'trailhead'</u>	2.0
Sandberg bluegrass	<u>Poa secunda</u>	0.1
Sheep fescue	<u>Festuca ovina</u>	1.0
Western yarrow	<u>Achillea lanulosa</u>	0.1
Ladak alfalfa	<u>Medicago sativa</u>	1.0
Yellow sweetclover	<u>Melilotus officinalis</u>	0.5
Palmer penstemon	<u>Penstemon palmerii</u>	0.5
Lewis flax	<u>Linum lewisii</u>	1.0
Pacific aster	<u>Aster chilensis</u>	0.1
Forage kochia	<u>Kochia prostrata</u>	0.5
Mountain big sagebrush	<u>Artemisia tridentata vaseyana</u>	0.1
White stem rabbitbrush	<u>Chrysothamnus nauseosus albicalus</u>	0.2

Total Seed 13.1 lbs/ac

* Rate is recommended for broadcast seeding methods.